STATEMENT TO THE NATIONAL ORGANICS STANDARDS BOARD MARCH 6, 2001, BUENA PARK, CA.

We are making this statement to you today on behalf of the largest national organizations representing beekeepers and honey handlers, respectively, in the United States.

Honeybees are a vital component of the natural ecology in our country. Their health and survival reflects the state of health of our own environment.

Honeybees gather pollen and nectar for their survival, and in doing so they provide pollination for important fruit, nut, vegetable, forage and field crops in the United States. In fact, a 1999 Cornell University study documented that the contribution made by managed honey bees hired by U.S. crop growers to pollinate their crops amounted to just over \$14.6 billion. Additionally, this estimate does not include incidental, non-fee based pollination of wildflower and foraging flora - - the latter is relevant to the broader ecosystem.

Just as a small but growing number of farmers are converting their production to follow organic standards, a small but dedicated group of beekeepers in the U.S. have converted their beekeeping operations and honey production to follow organic standards.

These beekeepers employ the ideals of beekeeping from past generations and use new tools of technology to insure the purity of their product.

There is a considerable variation in the organic standards for beekeeping and honey production among domestic and international certifying agencies. We believe that a single standard in the U.S.A. will benefit the beekeeping community and encourage U.S. beekeepers to consider conversion to organic standards.

We also believe that those who have direct knowledge of beekeeping and honey handling know best how to advise the National Organic Standards Board on adoption of standards. The ABF and the NHPDA request the NOSB allow us to operate as a task force working group to advise the board on organic standards for beekeeping and honey handling.

We have assembled a joint group of beekeeping and honey handling experts from all sections of the U.S.A., including individuals currently producing honey under organic methods. We intend to comment on the following areas of concern in organic apiculture:

APIARY LOCATION
FORAGE
EQUIPMENT
CONVERSION
BEE STOCK/QUEEN REARING

BEE YARD MANAGEMENT RECORD KEEPING SUPPLEMENTAL FEEDING PEST/DISEASE PREVENTION OUARANTINE PROCEDURES As well as these areas of concern in honey handling:

EXTRACTION SETTLING/STRAINING

HEAT APPLICATION SAMPLING

We believe it is critical that the standards be set including these post-harvest procedures, since standards are now in place for these areas in both international and domestic certifying agencies

Thank you for your consideration. We look forward to operating as your task force and as U.S. beekeepers and honey handlers working on an accurate, strict, realistic organic standard.

Sincerely

Clint Walker III, President, American Beekeeping Federation

Buddy Ashurst, President, National Honey Packers and

Dealers Association